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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

ENRON CREDITORS RECOVERY CORP.,
et al.,

Reorganized Debtors.

Chapter 11

Case No. 01-16034 (AJG)

(Jointly Administered)

DESIGNATION OF ITEMS FOR INCLUSION IN RECORD OF APPEAL

Standard Bank London, Limited ("Standard Bank"), by and through its undersigned counsel, pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, hereby designates the record in support of its Notice of Appeal [Docket No. 31161] to the United States District Court for the Southern District of New York from the Order Granting Reorganized Debtors' Objection to Standard Bank of London, Limited's Amended Proof of Claim No. 24626 (the "Order"), dated July 20, 2007 [Docket No. 31134], entered by the United States Bankruptcy Court for the Southern District of New York in the above-referenced proceeding.

Designation of Items to Be Included in the Record on Appeal¹

1. Debtors' Thirty-Ninth Omnibus Objection to Proofs of Claim (Claims Based on Duplicate Claims and Amended or Superseded Claims), dated July 29, 2004 (Docket No. 20048).
2. Order Granting Debtors' Thirty-Ninth Omnibus Objection to Proofs of Claim (Claims Based on Duplicate Claims and Amended or Superseded Claims), dated October 1, 2004 (Docket No. 21191).
3. Reorganized Debtors' Objection to Proof of Claim No. 24626 Filed by Standard Bank London, Limited, dated February 9, 2005 (Docket No. 23483).
4. Response in Opposition to Objection to Claim No. 24,626 of Standard Bank London, Limited, dated March 17, 2005 (Docket No. 24483).
5. Declaration of Daniel S. Lubell in Opposition to Objection to Claim No. 24,626 of Standard Bank London, Limited, dated March 17, 2005 (Docket No. 24483).
6. Transcript of Hearing Held Before Hon. Arthur J. Gonzalez on April 14, 2007 (Docket No. 30048).
7. Opinion Granting Reorganized Debtors' Objection To Standard Bank London, Limited's Amended Proof Of Claim No. 24626, signed by Hon. Arthur J. Gonzalez on June 13, 2007 (Docket No. 31065).
8. Order Granting Reorganized Debtors' Objection to Standard Bank of London, Limited's Amended Proof of Claim No. 24626, signed by Hon. Arthur J. Gonzalez on July 20, 2007 (Docket No. 31134).

¹ Each designated item shall also include any exhibits to such item.

Standard Bank reserves the right to amend this Designation of Items for Inclusion in Record on Appeal.

Dated: New York, New York
August 9, 2007

Respectfully submitted,

HUGHES HUBBARD & REED LLP

By: /s/ Daniel S. Lubell

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ENRON CREDITORS RECOVERY CORP.,
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Case No. 01-16034 (AJG)

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**STATEMENT OF ISSUES ON APPEAL OF ORDER GRANTING
REORGANIZED DEBTORS' OBJECTION TO STANDARD BANK OF
LONDON, LIMITED'S AMENDED PROOF OF CLAIM NO. 24626**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Standard Bank London, Limited ("Standard Bank"), through its counsel, hereby submits the following statement of issues in support of its the Notice of Appeal [Docket No. 31161] to the United States District Court for the Southern District of New York from the Order Granting Reorganized Debtors' Objection to Standard Bank of London, Limited's Amended Proof of Claim No. 24626 (the "Order"), dated July 20, 2007 [Docket No. 31134], entered by the United States Bankruptcy Court for the Southern District of New York in the above-referenced proceeding.

Statement of Issues

1. Did the Bankruptcy Court err by holding that, where Standard Bank incorrectly asserted a claim against Enron North America Corp. (“ENA”), a corporate affiliate and co-debtor of the true obligor Enron Corp. (“Enron”), Standard Bank may not amend its timely filed claim to assert a guaranty claim against Enron though Standard Bank filed an informal proof of claim against Enron as it attached a copy of the executed guaranty of Enron to the claim asserted against ENA and evidenced an intention to claim against Enron?
2. Did the Bankruptcy Court err by finding that Standard Bank failed to meet the requirements of Federal Rules of Civil Procedure 15(c)(2)-(3) for purposes of amendment of its timely filed claim in order to assert a guaranty claim against Enron?
3. Did the Bankruptcy Court err by finding that a balancing of the equities favor Enron, not Standard Bank, in determining that Standard Bank may not be permitted to amend its timely filed proof of claim in order to assert a guaranty claim against Enron?
4. Did the Bankruptcy Court err by not allowing amendment of Standard Bank’s claim to include the guaranty claim against Enron where Enron allowed a similar party, Kinder Morgan Interstate Gas Transmission, LLC (“Kinder Morgan”), to file a late guaranty claim against Enron where Kinder Morgan also incorrectly filed a guaranty claim against ENA?
5. Did the Bankruptcy Court err by not allowing Standard Bank’s guaranty claim against Enron where Standard Bank met the factors for “excusable neglect” as contained in Pioneer Inv. Servs. Co. v. Brunswick Assoc. L.P., 507 U.S. 380 (1993)?

Standard Bank reserves the right to supplement or amend this Statement of Issues.

Dated: New York, New York
August 9, 2007

Respectfully submitted,

HUGHES HUBBARD & REED LLP

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